

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * **CRIMINAL NO. 09-332**

v. * **SECTION: "B"**

JULES J. CHATELAIN *

* * *

F A C T U A L B A S I S

The Defendant, **JULES J. CHATELAIN** (hereinafter, "**CHATELAIN**"), has agreed to plead guilty as charged to the bill of information charging him with six counts of theft of mail matter, in violation of Title 18, United States Code, Section 1708.

Should this matter have gone to trial, the Government would have proven, through the introduction of competent testimony and admissible, tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the bill of information now pending against the defendant. **DEFENDANT CHATELAIN**, represented through undersigned counsel, agrees and stipulates that these following facts constitute a sufficient factual basis for the crime to which the defendant has been charged and has agreed to plead guilty:

_____ On January 22, 2009, in Jefferson, Louisiana, within the Eastern District of Louisiana, **CHATELAIN** traveled on foot along and around the 400-500 block of Coolidge Street. While traveling along Coolidge Street, **CHATELAIN** knowingly stole, took, and abstracted and attempted to steal, take, and abstract the contents of six (6) residential United States mail letter boxes (“mailboxes”) out of those mailboxes unlawfully. **CHATELAIN** did not have authorization or permission to remove the mail matter from any of the mailboxes.

In particular, **CHATELAIN** took three pieces of mail from the mailbox located at 405 Coolidge Street, Jefferson, Louisiana 70121; two pieces of mail from the mailbox located at 420 Coolidge Street, Jefferson, Louisiana 70121; three pieces of mail from the mailbox located at 422 Coolidge Street, Jefferson, Louisiana 70121; eleven pieces of mail from the mailbox located at 427 Coolidge Street, Jefferson, Louisiana 70121; four pieces of mail from the mailbox located at 446 Coolidge Street, Jefferson, Louisiana 70121; and four pieces of mail from the mailbox located at 504 Coolidge Street, Jefferson, Louisiana 70121.

DEFENDANT CHATELAIN was apprehended on January 22, 2009, by deputies of the Jefferson Parish Sheriff’s Office, in possession of the above-described pieces of mail.

In a subsequent interview with investigators, after being advised of his constitutional rights, **DEFENDANT CHATELAIN**, by way of a verbal admission and a hand-written statement, admitted to stealing and attempting to steal the mail matter from the mailboxes located at the six addresses identified above.

By engaging in the behavior outlined above, **DEFENDANT CHATELAIN** did steal, take, and abstract and attempt to steal, take, and abstract mail matter from six (6) separate and distinct residential letter boxes (“mailboxes”).

The above facts would have been proven beyond a reasonable doubt by credible testimony of inspectors from the United States Postal Inspection Service, other United States Postal Inspection Service employees, officers with the Jefferson Parish Sheriff's Office, eyewitnesses to the theft, documents and records of the United States Postal Inspection Service, and **DEFENDANT CHATELAIN'S** verbal and written confessions to agents from the United States Postal Inspection service of the foregoing facts.

APPROVED AND ACCEPTED:

JULES J. CHATELAIN Date
Defendant

ROMA KENT Date
(LA Bar No. _____)
Attorney for Defendant Chatelain

JORDAN GINSBERG Date
(IL Bar. No. 6282956)
Assistant United States Attorney